

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

TI LEE GOOBER, JR.
Defendant.

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Case No.: 3:20-CR-47 JD

MOTION TO CONTINUE CHANGE OF PLEA HEARING

Ti Lee Goober, by counsel, files his Motion to Continue the Change of Plea Hearing.

The following is asserted in support:

1. A Petition to Enter a Guilty Plea was filed in this matter on July 29, 2020.
[DE 13] The change of plea hearing is currently scheduled for August 14, 2020.
2. The undersigned is currently out of town moving his elderly parents into an assisted living facility and has become unable to participate in the change of plea hearing scheduled for today.
3. Counsel requests a brief continuance of this change of plea hearing and is available the week of August 17, 2020. Undersigned's paralegal has spoken with AUSA Gabrielse's office who advised there was no objection.

WHEREFORE, the defendant, by counsel, respectfully requests the change of plea be moved to the week of August 17, 2020.

Dated: August 14, 2020

Respectfully submitted,

Northern District of Indiana
Federal Community Defenders, Inc.

By: s/ Scott J. Frankel
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CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all parties of record.

/s/ Allyson A. King, Paralegal
Northern District of Indiana
Federal Community Defenders, Inc.